4402 Y Road
Bellingham, Washington 98226

January 10, 2013

GPT/BNSF Custer Spur EIS Co-Lead Agencies
1100 112th Avenue Northeast, Suite 400
Bellevue, Washington 98004

This letter contains my comments on the scoping phase of the EIS for the coal transshipment terminal proposed for Cherry Point, Whatcom County, Washington. It is my opinion that the following subject areas should be comprehensively researched, documented, and treated in the forthcoming EIS.

I am a 30-year resident of Whatcom County, a licensed geologist and hydrogeologist. I am an amateur naturalist, a recreational boater, and have taught marine safety classes.

The construction and operation of the proposed Cherry Point coal transshipment terminal can be reasonably expected to cause the following:

Marine transportation effects

Increased probability of ship accidents and resulting hazard to life, environment, and property. The issue should be analyzed at the level of detail shown in the George Washington University Vessel Traffic Risk Assessment (van Dorp et al. 2008). Mitigation measures, including the use of extended escort tugs between ocean Buoy J and Cherry Point, should be analyzed.

Increased vessel consumption of petroleum fuels of unknown quality, from bunker C to high quality diesel. Estimates of the kinds and amounts of incremental fuel use are needed. The public and decision makers need to know the effect of burning these fuels on the local airshed and on affected populations and ecology.

Increased demands on the Vessel Traffic System, the U. S. Coast Guard, aids to navigation, escort and standby tugs. These increases should be detailed with cost estimates and expectations of how they will be paid for.

Release of shipborne wastes from coal carrier vessels en route, at anchor, and at the terminal: sanitary waste; ballast water; bilge water; generator and main engine emissions; noise, both above and below the water surface.

Increased trespass light. Deep draft ships at anchor typically run high intensity deck lights in order to equalize the load on their on-board generators. This practice imposes substantial trespass light over a radius of many miles. The EIS should analyze the ecological effects of this trespass light. It should describe the imposition of trespass light on private property that has heretofore had the prospect of dark island viewscapes after sunset. I am a part time volunteer caretaker on Vendovi Island, a recently acquired natural area near the Saddlebag anchorage; at times there are

as many as five tanker ships anchored within a mile of the island; the noise and light from these ships is very intrusive. The increment due to the coal terminal needs to be quantified, analyzed, and mitigated. In devising performance criteria for shipping, account should be taken of the probable wide variety of registry and uneven standard of construction, maintenance, and seamanship of vessels calling at Cherry Point for coal cargoes.

Increased impacts from shipping on marine wildlife: birds, whales, seals, etc. This subject covers a vast range of species and a wide range of impacts, including air pollutants, water pollutants, noise, light, direct collisions. Anchoring of deep draft ships causes severe disturbance to the sea bed. The incremental effect of more ships anchoring in more anchorages disturbing more of the bottom should be evaluated. Effects include redistribution of bottom sediments, burying of marine invertebrates, loss of marine bird habitat. Required use of permanent mooring buoys should be evaluated.

Land transportation effects

Increased use of locomotive grade crossing horns: the state-wide geographic extent of the footprint of audibility, the quantitative estimates of the increment of horn noise, timing, frequency, and duration, and whether the effect could be mitigated by establishing quiet zones or changing horn characteristics, should be evaluated in the EIS. It needs to be clear if this is a problem for which there is no possible mitigation, or how it might be contained. Train horns are a significant adverse impact: I lived a block above the main line railway in Bellingham for ten years, and as the rail traffic increased during all hours of the night and day it became ever more impossible to obtain a night's rest. The project can only make this problem worse.

Increased railroad construction: a comprehensive review of all feasible rail routes from the Washington state line to Cherry Point is required, including specific locations of new double track, sidings, grade separations, etc. Claiming we do not know what the routes will be until the permits are issued is not a satisfactory answer.

Increased rail use of grade crossings, including mapping all grade crossings to be used in Washington State and the level of service they can be expected to reach with the project, and the feasibility of building grade separations.

Increased release of fugitive coal dust from hopper cars, including estimates of costs of airtight covers on the cars and what they would cost and who should pay for them. Analysis is needed of trace elements and heavy metals in Powder River Basin coal and the consequences of redistributing them across the transportation route.

Increased release of diesel fuel emissions from locomotives, including reviews of foreseeable technology that could reduce these emissions and the feasibility of requiring best available control technology for diesel locomotives, as well as effects on each community's airshed along the haul route; also including specific grades and chemical compositions of fuels and the cost implications of using the best grades for the project

Increased interference with existing transportation routes and schedules; passenger rail, road, grade crossings, delays, safety. Include increased frequency and severity of rail route closures due

to ground shaking by coal trains, landslides, characterization of slope stability. The EIS should contain a complete list of service interruptions due to mudslides or track collapses for the past decade. It should analyze what happens to backed-up coal trains between the eastern state line of Washington and Cherry Point, both inbound and outbound, to and from the proposed terminal, when the main line has been interrupted.

Increased rail traffic in the vicinity of Lake Terrell, a recently rehabilitated salmon habitat near the terminal. This lake has recently been the recipient of substantial resources devoted to the successful restoration of the natural hydrologic regime and salmon habitat. The effects of the proposal on these resource should be detailed in the EIS.

Coal terminal operation

The EIS needs to evaluate the consumption of fresh water in operating the various processes of moving coal from rail cars to stock pile to ships. What will be the source of this water? What will be the disposal procedure for the used water? Management of Whatcom County's precious water resource has been and continues to be a perennially contentious major public issue. All major water sources have been closed to new appropriations under state law for many years. Adding a large industrial use to the already burdened resource will create a significant new adverse impact.

Mitigation measures

The increased use of rail routes into Whatcom County by coal trains could be mitigated in a minor way by remediation of the interrupted shoreline streams to provide for fish passage. Hundreds of these streams were sacrificed to "shotgun culverts" when the railway was first constructed, and the damage has never been compensated or fixed. The EIS should contain a catalog of all the salt water streams so affected in the State of Washington, and a reconnaisance level appreciation of which ones have potential for habitat restoration.

The project should eliminate trespass light from ships for all but essential navigation and safety lighting. It should apply the standards developed by the International Dark Sky Association, which specify "full cut-off," i.e. no direct light emitted above the horizontal plane. Details of how this measure can be enforced should also be included.

Sincerely,

Peter Willing

REFERENCE

van Dorp J. R., Harrald J. R., Merrick J. R. W., Grabowski M. 2008. Assessment of Oil Spill Risk due to Potential Increased Vessel Traffic at Cherry Point, Washington. George Washington University